

Message

From: Rebecca Hollis [rhollis@cleanenergysystems.com]
Sent: 2/5/2020 9:57:20 PM
To: Albright, David [Albright.David@epa.gov]; Ho, Yenhung [Ho.Yenhung@epa.gov]
CC: Natalie Nowiski [NNowiski@slb.com]; Wade Zaluski [WZaluski@slb.com]; Wayne Rowe [rowe5@slb.com]; Julian Enahoro Ogolo [ogolo1@slb.com]; Keith Pronske [klpronske@cleanenergysystems.com]
Subject: RE: CLASS VI DATA CONFIDENTIALITY

Good afternoon David,

Thank you again for taking the time yesterday to speak with us regarding confidential business information (CBI) used to develop our Class VI permit application.

Per our discussion, the GS Data Tool is not configured to accept CBI. CES and Schlumberger are concerned that interpretations of purchased (licensed) data included in our permit application files (mainly the Project Narrative) would be in violation of our current license agreements if uploaded as is. So, we discussed a potential path forward where we remove or redact the confidential plots/charts/images/etc. from the files to be uploaded to the GS Data Tool site. Then separately, transmit the CBI (plots/charts/images/etc.) to EPA via a mutually agreed upon method still TBD, e.g. hard copies, secure online electronic file transfer, etc. This way, 1) EPA will have all the required information necessary to evaluate our permit application, 2) CES-vendor confidential information will be protected, 3) the majority of the application material will be uploaded to the GS Data Tool site, and 4) the public process will not be interfered with (or at least only minimally). CES and Schlumberger estimate only about a dozen images or so would need to be redacted from the application files as they include details from licensed seismic and well data.

When we left the call I believe you were going to confirm that this was an acceptable path forward with EPA. Also, Natalie requested guidance from EPA regarding CBI.

Please let me know if I have correctly captured the discussion and if you have made any progress confirming our path forward.

Thank you again and Happy Wednesday,
-Rebecca

Rebecca Hollis
Director Business Development -


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The Power to Reverse Climate Change

-----Original Appointment-----

From: Wayne Rowe <rowe5@slb.com>
Sent: Tuesday, February 4, 2020 11:21 AM
To: Wayne Rowe; Albright, David; Ho, Yenhung; Rebecca Hollis; Natalie Nowiski; Julian Enahoro Ogolo
Subject: CLASS VI DATA CONFIDENTIALITY
When: Tuesday, February 4, 2020 3:30 PM-4:30 PM (UTC-08:00) Pacific Time (US & Canada).
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